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**DISTRICT COURT**

## CLARK COUNTY, NEVADA

DINA BARELA, individually

CASE NO.: 2:21-cv-00084-RFB-VCF

Plaintiff,

VS.

USAA CASUALTY INSURANCE  
COMPANY; DOES 1 through 20; ROE  
BUSINESS ENTITIES 1 through 20, inclusive  
jointly and severally

## Defendants.

**STIPULATION AND  
ORDER TO EXTEND DEADLINE FOR  
PLAINTIFF TO FILE HER REPLY TO  
DEFENDANT USAA CASUALTY  
INSURANCE COMPANY'S  
OPPOSITION TO PLAINTIFF'S  
MOTION TO REMAND**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff DINA BARELA, through her counsel of record, SAMANTHA A. MARTIN, ESQ. of the RICHARD HARRIS LAW FIRM, and Defendant USAA CASUALTY INSURANCE COMPANY, through their counsel of record, ROBERT W. FREEMAN, ESQ., PRISCILLA L. O'BRIANT, ESQ. and JENNIFER A. TAYLOR, ESQ. of LEWIS BRISBOIS BISGAARD & SMITH LLP, that the deadline for Plaintiff to file her Reply to Defendants' Opposition to Plaintiff's Motion to Remand shall be extended from February 11, 2021 to February 19, 2021. The Opposition was filed on February 4, 2021. This is the first request for extension of time for Plaintiff to file her Reply to Defendants' Opposition. This Stipulation and Order is submitted in accordance with LR IA 6-1.

The parties request this brief extension because counsel for Plaintiff has been participating in, and preparing for, a bench trial in front of Magistrate Judge Cam Ferenbach in

1 the case of *Tucker v. United States of America*, Case No. 2:18-cv-02255-VCF, which took place  
2 on February 8 and February 9, 2021. This short extension of time will allow Plaintiff to fully  
3 address each of the arguments set forth in Defendants' Opposition to aid this Court in its ultimate  
4 decision as to whether this matter should be remanded back to state court.

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6 Accordingly, the parties respectfully request this Court to approve the foregoing  
7 stipulation. Their requested extension is not made in bad faith or to unnecessarily delay these  
8 proceedings.

9 DATED this 11th day of February, 2021.

10 **RICHARD HARRIS LAW FIRM**

11 /s/ Samantha A. Martin

12 \_\_\_\_\_  
13 Samantha A. Martin, Esq.  
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15 801 S. 4<sup>th</sup> Street  
16 Las Vegas, NV 89101  
17 *Attorney for Plaintiffs*

DATED this 11th day of February, 2021

**LEWIS BRISBOIS BISGAARD &  
SMITH LLP**

/s/ Jennifer A. Taylor

18 \_\_\_\_\_  
19 ROBERT W. FREEMAN  
20 Nevada Bar No. 3062  
21 PRISCILLA L. O'BRIANT  
22 Nevada Bar No. 10171  
23 JENNIFER A. TAYLOR  
24 Nevada Bar No. 6141  
25 6385 S. Rainbow Boulevard, Suite 600  
26 Las Vegas, Nevada 89118  
27 *Attorneys for Defendants*

28  
19 **ORDER**

20 **IT IS SO ORDERED.**

21 DATED this 11<sup>th</sup> day of February, 2021.



22 \_\_\_\_\_  
23 **RICHARD E. BOULWARE, II**  
24 **United States District Court**

25 DATED this 13th day of February, 2021.

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